

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION

TYLER TECHNOLOGIES, INC.,)	
)	Civil Action No. <u>3:22-1991-CMC</u>
Plaintiff,)	
)	
vs.)	LEXINGTON COUNTY, SOUTH
)	CAROLINA'S LOCAL RULE 26.01
LEXINGTON COUNTY, SOUTH)	INTERROGATORY ANSWERS
CAROLINA,)	
)	
Defendant.)	
_____)	

Defendant Lexington County, South Carolina ("Lexington County") responds to the Interrogatories set forth in Local Rule 26.01, DSC, as follows:

(A) State the full name, address and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of that interest.

ANSWER:

Lexington County is not aware of any entities that may have a subrogation intent.

(B) As to each claim, state whether it should be tried jury or nonjury and why.

ANSWER:

Lexington County's Answer and Counterclaim should be tried by a jury as there are issues of fact to be decided.

(C) State whether the party submitting these responses is a publicly-owned company and separately identify (1) any parent corporation and any publicly-held corporation owning ten percent (10%) or more of the party's stock; (2) each publicly-owned company of which it is a parent; and (3) each publicly-owned company in which the party owns ten percent (10%) or more of the outstanding shares.

ANSWER:

Lexington County is a political subdivision of the State of South Carolina and is not a publicly-owned company.

(D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division). *See* Local Civ. Rul. 3.01 (D.S.C.).

ANSWER:

Lexington County is in the Columbia division of the Federal Court.

(E) Is this action related in whole or in part to any other matter filed in this district, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases that *may be* related regardless of whether they are still pending. Whether cases *are* related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases arise from the same or identical transactions, happenings, or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

ANSWER:

This case is not related to any other case pending in the Columbia division.

(F) If the Defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

ANSWER:

The Defendant is properly identified.

(G) If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of their liability.

ANSWER:

As part of the Contract with Lexington County, the Plaintiff had to provide a performance bond that was issued by Travelers Casualty and Surety Company of America.

(Signature Page Follows)

/s Jeff M. Anderson (SC Federal Bar #1084)
DAVIS FRAWLEY, LLC
140 East Main Street, Lexington, SC 29072
Phone No.: (803) 359-2512
Attorneys for the Defendant Lexington County, South Carolina

26th Day of August, 2022

Lexington, South Carolina.